

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JEFFRY JESUS ROSA,

Plaintiff,

-against-

WILLIAM KUPIEC and JB HUNT TRANSPORT  
INC.,

Defendants.  
-----X

Docket No.: \_\_\_\_\_

**NOTICE OF REMOVAL**

Supreme Court,  
Bronx County  
Index No.: 805986/2022E

The defendants, **WILLIAM KUPIEC and J.B. HUNT TRANSPORT INC.**, remove this action from the Supreme Court, Bronx County to the United States District Court for the Southern District of New York.

1. The plaintiff commenced this action against **WILLIAM KUPIEC and J.B. HUNT TRANSPORT INC.** in the Supreme Court of the State of New York, Bronx County. A copy of the complaint is attached as **Exhibit "A"**.

2. The plaintiff, Jeffrey Jesus Rosa, is a citizen of the State of New York and was a citizen of the State of New York when this action was started in state court.

3. The defendants are citizens of a state other than the State of New York and were citizens of a state other than the State of New York when this action was started in state court.

a.) J.B. Hunt Transport, Inc. is (and was) a corporation incorporated in the State of Georgia with its principal place in business in Lowell, Arkansas.

b.) William Kupiec, upon information and belief, resides and has been residing in Somerset County, Hillsborough Township, New Jersey when this action was started in state court. William Kupiec is a citizen of the State of New Jersey.

4. J.B. Hunt Transport, Inc. was served on May 12, 2022 and William Kupiec was served on May 12, 2022.

5. This court has subject-matter jurisdiction over this action under section 1332(a)(1) of the Judicial Code, 28 U.S.C. § 1332(a)(1), because this action—both now and when it was started—is between citizens of different states and the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

7. The defendants may, under section 1441(a) of the Judicial Code, 28 U.S.C. § 1441(a), remove this action to this court because this is a civil action of which the District Courts of the United States have original jurisdiction that is brought in a state court.

8. All defendants join in the removal of this action to this Court.

Dated: New York, New York  
June 10, 2022

RAWLE & HENDERSON LLP  
Attorneys for Defendants  
**WILLIAM KUPIEC and J.B.  
HUNT TRANSPORT INC.,**



By:

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**JEFFRY JESUS ROSA**